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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91164357
Party	Plaintiff Padres L.P. Padres L.P. ,
Correspondence Address	Antonio Borrelli Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Antonio Borrelli
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Date	03/30/2007
Attachments	munido.PDF ( 3 pages )(20856 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

	X	
PADRES L.P.,	:	
Opposer,	:	Opposition No. 91 164,357
v.	:	
ERESMAS INTERACTIVA, S.A.,	:	
Applicant.	:	
	X	

**MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDINGS  
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order continuing the suspension of the proceedings in this matter for a period of six (6) months, until **October 7, 2007**. Applicant's counsel consented to this motion, which is requested to allow the parties to pursue settlement discussions. Since the last continuance, the parties have executed a settlement agreement that resolves this matter and a corresponding matter in Europe. The additional time is requested to allow applicant to file an amendment as required by the settlement agreement, and for the Trademark Office to act upon the amendment. If the amendment is accepted by the Trademark Office, it would resolve these matters without the need to proceed with the opposition.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, in the event that the matter is taken out of suspense, Opposer consents to an extension of time for Applicant to answer or otherwise respond to the Notice of Opposition until sixty (60) days after the proceedings resume. Additionally, the parties request that six months of discovery be allowed and that the discovery cut off be reset to six (6) months after the proceedings resume so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial periods should be reset accordingly.

Dated: New York, New York  
March 30, 2007

COWAN, LIEBOWITZ & LATMAN, P.C.

By /Antonio Borrelli/  
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Attorneys for Opposer

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing MOTION ON CONSENT was sent via first class, postage paid mail to Applicant's attorney, Jeffrey L. Van Hoosear, Esq., Knobbe, Martens, Olson & Bear LLP, 2040 Main Street, 14th Floor, Irvine, CA 92614, on March 30, 2007.

/Antonio Borrelli/

Antonio Borrelli